

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**L. LIN WOOD, JR.,**

**Plaintiff,**

**v.**

**BRAD RAFFENSPERGER, in his official  
capacity as Secretary of State of the State  
of Georgia, REBECCA N. SULLIVAN,  
in her official capacity as Vice Chair of  
the Georgia State Election Board,  
DAVID J. WORLEY, in his official  
capacity as a Member of the Georgia  
State Election Board, MATTHEW  
MASHBURN, in his official capacity as  
a Member of the Georgia State Election  
Board, and ANH LE, in her official  
capacity as a Member of the Georgia  
State Election Board,**

**Defendants.**

**CIVIL ACTION FILE NO.  
1:20-cv-04651-SDG**

**AFFIDAVIT OF TIFFANY SAVAGE IN SUPPORT OF  
PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER**

I, Tiffany Savage, declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 years and competent to testify herein. I have personal knowledge of the matters stated herein. I am a resident of Gwinnett County. My husband and I own two small businesses in Gwinnett County.

2. I volunteered to be a monitor for the Donald J. Trump Presidential Campaign, Inc. (the “Trump Campaign”) in connection with what was identified to me as the “hand count” of votes cast in the November 3, 2020 presidential election. I was assigned to monitor the hand count on November 14 through 17.
3. I was assigned to be an official monitor at the location at Beauty P. Baldwin Voter Registrations and Elections Building in Lawrenceville. I believed that we were there to watch actual “hand counting” as had been announced in the newspapers and by the Secretary of State when he requested a “hand count.”
4. In the course of monitoring on November 14, I noticed some major red flags that undermined the fairness of the process. I do not see these being addressed in a way that is fair and equitable.
5. Ballots were being grouped into batches. It was not clear for what purpose. They were not being counted, as far as I could tell. I do not know what training or instruction had been given to these groupers, but the activity seemed meaningless.
6. Envelopes from mail in ballots had been separated from the signatures on the absentee ballot eternal envelopes. Electors during in-person early voting or on Election Day were required to show identification; signature verification was not available for audit in the recount.

7. Batches of ballots were marked with discrepancies on post it notes. See picture on Annex 1. Ballots were placed in unmarked bins that are unattended or just placed randomly on a counter just lying around. There appeared to be little, if any, supervision, or control. I saw at least one open ballot box (container ABM5B/ 31148252). See picture on Annex 1.
8. Four hours after a shift change, at many stations (at least 4 that I could see), the counters were not counting ballots correctly. Instead of the “pass count” for dual control purposes, counters were opening ballot batches independently and “fast counting.”
9. I reported the fast counting, and announcement was made to cause the counters to use a confirmed process for reviewing and counting the ballots. Perhaps there had been some training, but it seemed inconsistent. But even after an announcement was made asking them to resume “pass counting.” they continued to batch and group “just get it over with.”
10. Unsecured, completed ballot boxes were left all day when they should have been secured by the (green) numbered lock tags. The security tags were being used to lock the bags of ballots, but they were lying around in the open and could have been used by anyone. See picture on Annex 1. There was no permanent processing of assigning a tag number to a bag, so every bag was

vulnerable to opening, tampering, and relocking at any point in time when the room was not being monitored.

11. The counters did not note the time verification on the machine-read voting ballots.

12. I overheard a poll official saying that damaged ballots were being or had been “duplicated.” I am not allowed to directly interact with a poll official, so I could not ask what that official meant by that statement. There were hundreds of damaged or voided ballots (which were all duplicated).

13. On November 15, 2020, the counting continued in the same haphazard way until 2:48 p.m., when counting was stopped because the laptops all “went down.” The official counting did not resume that day but at 5:00 p.m., the counters were dismissed due to “counter fatigue.”

14. Batches of ballots were sitting around unattended. The ballot boxes were locked with green security tags on the front but could be opened from the other side without cutting the green security tag. The boxes are not secured.

15. \*Gwinnett Election informed that the Green security tag numbers are not documented and maintained anywhere except on a Post-it note inside the box. The bag numbers are not kept in an independent location, so the ballots are subject to tampering. The tags can be cut, the ballot box opened, ballots can

be manipulated. And a new Post-it note can be placed inside the box with the new (not original) green security tag when the boxes are unmonitored.

16.The “24 hour camera feed” only shows ballot counters, not the voter review or “secured ballot boxes.” The 24 hour camera feed is closed off after hours and appears dark.

17.All officers, who work for sheriff office, left the building when the counters left. Yet persons with badges were exiting and entering the building and walking out with folders.

18.After hours, anyone with a key to the building can have access to the open room and this counting area.

19.I returned on November 16 and witnessed the same level of confusion as the 14<sup>th</sup> and 15<sup>th</sup>. On the 16<sup>th</sup>, we were not permitted in the counting area until 9:30. At 8:30, all poll workers were released (approximately 75% of all counters). The remaining counters did not appear to be aware of the rules, and even when instructed, continued to blatantly disregard the counting procedures.

20.The ballot box that had been left unsecured on November 14 was still unsecured two days later. Green security tags were cut and replacement tags were not being recorded properly.

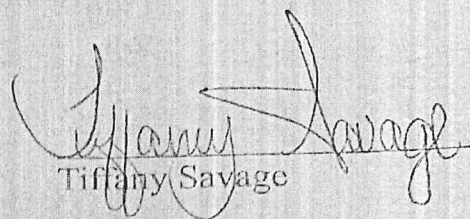
21. Some ballot batch tally sheets have no number written at all in the Trump column but include numbers for Biden; I regarded those as not likely to be 100% Biden votes in a given batch, but just incomplete.
22. A laptop with access to the data entry system was left in the open area with the password for the wifi and the laptop on a Post-it note affixed to the laptop. When informed of this security breach, the supervisor simply said, "I know." The "secured ballot counting area" was wide open to many people, even some without a security badge.
23. One worker was entering numbers and writing on ballot sheets alone and out of sight of the security camera. When informed, the supervisor simply moved her to another table.
24. The ballot batch tally sheets that are then given to the data entry tables were marked in red pen. Red pens were left on the table, which would permit the auditors to correct the ballot batch tally sheets they were auditing.
25. On November 17, the lack of security, confusion, and hostility to Republican poll watchers continued. The supervisor placed a red line in tape across the floor and instructed the poll watchers to stand behind the gold tape. There was no way to see if the ballots were being read correctly. See picture on Annex 1.

26. We saw further instances of gross violations of the rules that were established to this recount. Auditors who were informed they had violated the rules did not change their behavior. There was no way to tell if any counting was accurate.

**[SIGNATURE AND OATH ON NEXT PAGE]**



I declare under penalty of perjury that the foregoing statements are true and correct


  
Tiffany Savage

STATE OF GEORGIA

COUNTY OF GWINNETT

Tiffany Savage, appeared before me, a Notary Public in and for the above jurisdiction, this 16<sup>th</sup> day of November 2020, and after being duly sworn, made this Declaration, under oath.



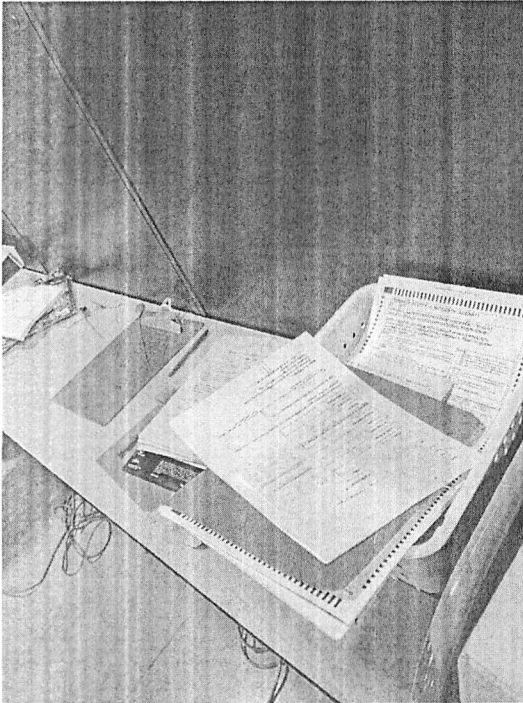
  
Notary Public

My Commission Expires 07-29-2024

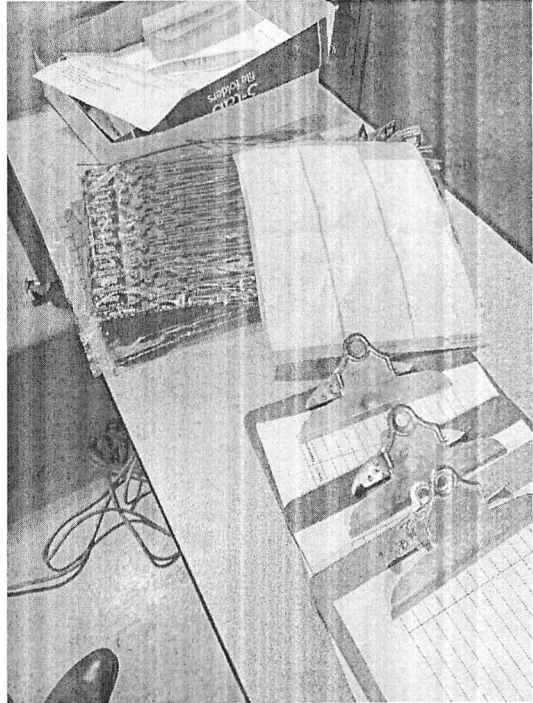


## Annex 1

Picture 1



Picture 3



Picture 2



Picture 4

